

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

IN RE:	Case No. 24-30167
Pro-Mark Services, Inc.,	Chapter 7
Debtor.	Chief Judge Shon Hastings
Erik A. Ahlgren, Trustee,	
Plaintiff,	
-v-	Adv. Case No. 24-07014
Connie Berg, et al.,	
Defendants.	
STIPULATED MOTION TO EXTEND MIGUEL PAREDES' TIME TO RESPOND TO PLAINTIFF'S AMENDED COMPLAINT	

1. Plaintiff, Erik A. Ahlgren, as Chapter 7 Trustee of the Bankruptcy Estate of Pro-Mark Services, Inc., as Administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan, and as Trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust, filed this Adversary Proceeding against the Defendants, including Defendant Miguel Paredes on August 26, 2024. (Doc. 1.) Plaintiff filed an Amended Complaint on September 25, 2024. (Doc. 11.)

2. Defendant Paredes filed a Motion to Dismiss on October 25, 2024. (Doc. 30.) The Court entered an Order Denying in Part and Granting in Part Defendant Paredes' Motion to Dismiss on April 4, 2025. (Doc 103.)

3. At the Oral Arguments held on April 2-3, 2025, Plaintiff informed the Court that he intended to file a second amended complaint, taking into account several aspects of the Court's rulings on the motions to dismiss. That Second Amended Complaint was filed May 20, 2025. (Doc. 120.)

4. The Court granted the parties' stipulated motion setting the deadline for Defendant Miguel Paredes to Answer the Second Amended Complaint to 30 days after the Second Amended Complaint was filed, or June 19, 2025. (Doc. 107.)

5. Plaintiff and Defendant Paredes now move the Court, by stipulation, for an order extending Paredes' deadline to respond to the Second Amended Complaint by 14 days, up to and including July 3, 2025.

6. This extension is not sought for purposes of delay. A short extension is required to fully respond to the Second Amended Complaint's 104 pages and 520 paragraphs, and in light of the other professional commitments of counsel.

Dated:

/s/ Peter D. Kieselbach

Michael Fisco (*pro hac vice*)
Peter D. Kieselbach (*pro hac vice*)
GREENBURG TRAUIG, LLP
90 South Seventh St., Suite 3500
Minneapolis, MN 55402
(612) 259-9710
fiscom@gtlaw.com
kieselbachp@gtlaw.com

Attorneys for Plaintiff

Dated:

/s/ Michael L. Scheier

Michael L. Scheier (*pro hac vice*)
Jacob D. Rhode (*pro hac vice*)
Samuel B. Weaver (*pro hac vice*)
KEATING MUETHING & KLEKAMP PLL
One East Fourth Street, Suite 1400
Cincinnati, OH 45202
(513) 579-6952
mscheier@kmlklaw.com

and

Michael L. Gust (ND #06468)
ABST LAW, P.C.
4132 30th Avenue SW, Suite 100
P.O. Box 10247
Fargo, ND 58106-0247
(701) 235-3300
mgust@abstlaw.net

Attorneys for Defendant Miguel Paredes